

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 1:17-mc-00151-LPS

**CONOCOPHILLIPS' UNOPPOSED MOTION FOR EXEMPTION
OF PERSONS FROM THE DISTRICT OF DELAWARE'S MAY 15, 2023
STANDING ORDER ON PERSONAL DEVICES**

Non-parties Phillips Petroleum Company Venezuela Limited, ConocoPhillips Petrozuata B.V., ConocoPhillips Gulf of Paria B.V., and ConocoPhillips Hamaca B.V. (plaintiffs in Cases No. 19-mc-00342-LPS, No. 22-mc-00264-LPS, and No. 22-mc-464-LPS) (collectively, "ConocoPhillips") hereby move for an order to exempt certain persons from the District of Delaware's May 15, 2023 Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the "May 15, 2023 Standing Order"). In support of the Motion, ConocoPhillips state as follows:

1. The District of Delaware's May 15, 2023 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require, *inter alia*, visitors to place personal electronic devices in a locked pouch provided by U.S. Marshals. Paragraph 4 of the May 15, 2023 Standing Order provides for certain exemptions to the Standing Order.

2. A status conference is scheduled for February 27, 2024.

3. Certain counsel for ConocoPhillips who intend to appear at the February 27, 2024 status conference do not meet the exemptions listed in Paragraph 4 of the May 15, 2023 Standing Order. These counsel are in good standing with at least one State bar in the United States, and have been admitted *pro hac vice*, in one or more of the above-captioned actions; however, they do not possess a physical, hard-copy Bar ID card. These persons include:

- i. Lydia L. Halpern;
- ii. Amy R. Wolf; and
- iii. Michael H. Cassel.

In addition, Lindsey Raspino, in-house counsel for ConocoPhillips, intends to appear as client representative at the February 27, 2024 hearing.

4. ConocoPhillips respectfully request that the Court issue an order, in the form attached hereto, to exempt certain persons from the District of Delaware's May 15, 2023 Standing Order.

5. Defendants Bolivarian Republic of Venezuela and PDV Holdings, Inc. and Plaintiff Crystallex International Corporation do not oppose this request.

Respectfully submitted,

ROSS ARONSTAM & MORITZ LLP

Of Counsel:

Michael S. Kim
Marcus J. Green
Josef M. Klazen
Lydia L. Halpern
KOBRE & KIM LLP
800 Third Avenue
New York, New York 10022
(212) 488-1200
michael.kim@kobrekim.com
marcus.green@kobrekim.com
jef.klazen@kobrekim.com
lydia.halpern@kobrekim.com

/s/ Elizabeth M. Taylor
Garrett B. Moritz (Bar No. 5646)
Elizabeth M. Taylor (Bar No. 6468)
1313 North Market Street, Suite 1001
Wilmington, Delaware 19801
(302) 576-1600
gmoritz@ramllp.com
etaylor@ramllp.com

*Attorneys for Phillips Petroleum Company
Venezuela Limited, ConocoPhillips
Petrozuata B.V., ConocoPhillips Hamaca
B.V., and ConocoPhillips Gulf of Paria B.V.*

Richard G. Mason
Amy R. Wolf
Michael H. Cassel
WACHTELL, LIPTON, ROSEN & KATZ
51 West 52nd Street
New York, New York 10019
(212) 403-1000
RGMason@wlrk.com
ARWolf@wlrk.com
MHCassel@wlrk.com

Dated: February 23, 2024